

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA )  
 ) NO. 3:22-CR-00340  
v. )  
 ) CHIEF JUDGE CRENSHAW  
MAHAN JANBAKHSH )  
a/k/a MARK JANBAKHSH )  
STEVEN L. PIPER )

**GOVERNMENT'S NOTICE OF ANTICIPATED EXPERT TESTIMONY**

The United States of America, through Henry C. Leventis, United States Attorney for the Middle District of Tennessee, and Assistant United States Attorneys Kathryn Booth and Chris Suedekum, pursuant to Rules 16(a)(1)(F) and (G) of the Federal Rules of Criminal Procedure and this Court's Order (D.E. 60), hereby files this notice disclosing witnesses whose testimony may be construed as expert testimony pursuant to Rules 702 and 703 of the Federal Rules of Evidence in the above-referenced case.<sup>1</sup>

The Government gives notice that the following witnesses may provide expert testimony:

1. Morris Aaron
2. Holly Detweiller
3. Megan Seliber
4. Christopher (Joey) Wooten

Contemporaneous with this Notice, the government is filing the expert disclosure for each witness with the Court.

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<sup>1</sup> In this filing, the Government has identified the expert witnesses it may seek to call at trial on June 18, 2024. To the extent that the Government learns of additional witnesses, or determines that it may call certain additional witnesses as experts who have not been identified below, the government will supplement or amend this Notice with a reasonable time of learning of additional witnesses and/or making that determination.

In accordance with the Court's Judicial Preferences and its Order entered on July 24, 2023 (D.E. 60), in advance of trial the government will provide the Court with a copy of the expert disclosure, any report(s), and CV for each expert witness that the government anticipates will be called to testify at trial.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing will be served electronically to counsel for defendants, via the Court's Electronic Case Filing System, on January 12, 2024.

s/Kathryn W. Booth  
KATHRYN W. BOOTH  
Assistant United States Attorney